



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 5, 2008

RQ-2

Doug Robertson, Treasurer  
South Carolina Republican Party  
P.O. Box 12373  
Columbia, SC 29211

Response Due Date:  
December 8, 2008

Identification Number: C00034033

Reference: Amended July Monthly Report (6/1/08-6/30/08), received 9/22/08

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 items:

1. Your Amended May Monthly (4/1/08-4/30/08), received 9/22/08, June Monthly (5/1/08-5/31/08), received 9/22/08, and July Monthly (6/1/08-6/30/08), received 9/22/08 Reports combined do not disclose any payments for salary or wages on Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §100.24 defines as Federal Election Activity, services provided by an employee of a State, district or local party committee who spends more than 25 percent of their time during that month on activities in connection with a Federal election. You are advised that payments for salaries and wages for employees who spend more than 25 percent of their compensated time in a given month on Federal Election Activity or activities in connection with a Federal election must be made with Federal funds only. Please provide clarification regarding the lack of payments for salary and wages disclosed by your committee.

2. Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "health insurance," "ITEMIZE: health insurance," "net pay," and "payroll taxes." Please be advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on Federal election activity (FEA) or activities in connection with a Federal election must not be allocated between or among federal and non-federal accounts. Rather, only federal funds may be used. Further, the Commission concluded in

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Advisory Opinion 2003-11 that amounts spent for employee-specific "fringe benefits," consisting of health insurance, disability insurance, life insurance, retirement benefits and payroll taxes, fall into the category of compensated time.

Please clarify whether this activity is for employees who spent 25% or less of their time during the month(s) referenced above on FEA or activities in connection with a Federal election. If this is not the case, any reimbursement from your committee's non-federal account for this payment is not permissible and must be returned. Although the Commission may take further legal action regarding any improper allocation activity, your prompt action will be taken into consideration.

3. A review of your report discloses a receipt on Line 17 from "A G Edwards & Sons, Inc." for "Interest Received." However, you have not included this as a depository on Line 9 of your Statement of Organization. Please be advised that your Statement of Organization must include a listing of all banks, safe deposit boxes, or other depositories used by your committee. Please amend your Statement of Organization to identify all depositories being used by your committee or provide clarifying information regarding this receipt. 11 CFR §102.2(a)(1)(vi)

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,

*Nicole Della Rocco*

Nicole Della Rocco  
Campaign Finance Analyst  
Reports Analysis Division

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